

ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

In re Applications of  
READING BROADCASTING, INC.

For Renewal of License of  
Station WTVE(TV), Channel 51  
Reading, Pennsylvania

and

ADAMS COMMUNICATIONS CORPORATION  
For Construction Permit

TO: Magalie Roman Salas, Secretary  
for direction to  
The Honorable Richard L. Sippel  
Administrative Law Judge

RECEIVED

JUL 15 1999

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

MM Docket No. 99-153

File No. BRCT-940407KF

File No. BPCT-940630KG

MOTION TO ENLARGE ISSUES

Harry F. Cole

Bechtel & Cole, Chartered  
1901 L Street, N.W.  
Suite 250  
Washington, D.C. 20036  
(202) 833-4190

Counsel for Adams Communications  
Corporation

July 15, 1999

No. of Copies rec'd 076  
List A B C D E

### SUMMARY

The issues in this proceeding must be enlarged to include two separate and independent, but related, issues concerning the basic qualifications of Reading Broadcasting, Inc. ("RBI").

The first requested issue was mandated by the full Commission in Two If By Sea Broadcasting, Inc., 12 FCC Rcd 2254 (1997). There the Commission specifically held that "serious character questions" exist relative to Micheal Parker, who was the dominant principal of an applicant then seeking to acquire a station. Those "serious character questions" arose from the fact that Mr. Parker (or entities in which he was a principal) had previously been found to have engaged in serious and repeated fraud and deception before the Commission. The Commission declined to grant consent to that requested assignment for a number of reasons, including the fact of the outstanding unresolved questions concerning Mr. Parker.

Mr. Parker is the dominant principal of RBI. The "serious character qualifications" referred to by the Commission in Two If By Sea Broadcasting have not since been resolved. Accordingly, they must be added herein, addressed, and resolved before any action can be taken on RBI's renewal application.

The second requested issue arises from the fact that, in multiple applications filed by Mr. Parker since the adjudications of fraudulent and deceptive conduct referred to above, Mr. Parker failed to advise the Commission of the nature and extent of the

misconduct at issue there. Instead, his descriptions of his previous history before the Commission were designed to create the impression that no questions concerning his (or his applicant's) basic qualifications had even been raised. In reality, such questions had not only been raised, they had been resolved adversely to Mr. Parker's applicants.

Mr. Parker's pattern of misrepresentation and lack of candor -- clearly established in Mt. Baker Broadcasting Co., Inc., 3 FCC Rcd 4777 (1988) and Religious Broadcasting Network, 2 FCC Rcd 6561, 6566-67 (ALJ 1987), aff'd, 3 FCC Rcd 4085, 4090 (Rev. Bd. 1988) -- thus continued for years thereafter. An issue into that pattern of misconduct, and the effect of that misconduct on RBI's qualifications to remain a licensee, is also required here.

TABLE OF CONTENTS

Summary . . . . .	ii
Background . . . . .	2
Requested Issue No. 1 - Previously Adjudicated Misconduct . .	5
Requested Issue No. 2 - Misrepresentation/Lack of Candor . .	6
Conclusion . . . . .	15

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In re Applications of	)	MM Docket No. 99-153
	)	
READING BROADCASTING, INC.	)	File No. BRCT-940407KF
	)	
For Renewal of License of	)	
Station WTVE(TV), Channel 51	)	
Reading, Pennsylvania	)	
	)	
and	)	
	)	
ADAMS COMMUNICATIONS CORPORATION	)	File No. BPCT-940630KG
	)	
For Construction Permit	)	
TO: The Honorable Richard L. Sippel		
Administrative Law Judge		

MOTION TO ENLARGE ISSUES

1. Pursuant to Section 1.229 of the Commission's Rules <sup>1/</sup>, Adams Communications Corporation ("Adams") hereby moves to enlarge the issues in the above-captioned proceeding to include the following issues:

To determine whether, in view of the previously adjudicated misconduct of Micheal L. Parker, the controlling shareholder and dominant principal of Reading Broadcasting, Inc. ("RBI"), RBI is qualified to remain a licensee.

To determine whether Micheal L. Parker engaged in a pattern of misrepresentation and/or lack of candor in repeatedly failing to advise the Commission of the actual nature and scope of his previously adjudicated misconduct and, if so, the effect of such pattern of misrepresentation and/or lack of candor on RBI's qualifications to remain a licensee.

The basis for this petition is as follows:

---

<sup>1/</sup> The Hearing Designation Order initiating this hearing was published in the Federal Register on June 15, 1999. See 64 FR 32046.

### Background

2. The incumbent renewal applicant in this proceeding is Reading Broadcasting, Inc. ("RBI"). The dominant principal and controlling shareholder of RBI is Micheal L. Parker.<sup>2/</sup> Mr. Parker controls approximately 42% of RBI's ownership.<sup>3/</sup> No other RBI principal owns as much as a 9% interest; the vast majority of RBI's remaining stock is divided among approximately 50 shareholders, most of whom own less than 1%. Plainly, Mr. Parker is the dominant principal of RBI.<sup>4/</sup>

3. Mr. Parker is no stranger to broadcast proceedings before the Commission. He has been a principal of a number of broadcast applicants, and licensees, over the course of the last 15-20 years.

4. Most importantly, he has been found to have engaged in serious, disqualifying misconduct in Commission proceedings. In Religious Broadcasting Network, 2 FCC Rcd 6561, 6566-67 (ALJ

---

<sup>2/</sup> Micheal (sometimes spelled "Michael") Parker is also referred to as Mike Parker and M.L. Parker in various documents prepared by him.

<sup>3/</sup> According to RBI's 1998 Ownership Report (the most recent report which Adams could locate in the Commission's files), he owns 3.01% of RBI's stock in his own name, and 30.06% in the name of Partel, Inc., a company of which he is the president, sole director and sole shareholder. In addition, according to that Ownership Report, Mr. Parker holds an irrevocable proxy, coupled with an interest, for 65,463 shares, amounting to approximately 9.21% of RBI's stock. Mr. Parker is listed in RBI's Ownership Reports as President and one of five Directors of RBI.

<sup>4/</sup> Mr. Parker's central role in RBI was underscored in June, 1999, when RBI sought an extension of the prehearing conference herein because of Mr. Parker's unavailability because of the death of a family member.

1987), aff'd, 3 FCC Rcd 4085, 4090 (Rev. Bd. 1988), Mr. Parker was found to have been a real-party-in-interest and the "true kingpin" behind an applicant which was a "travesty and a hoax", a "transpicuous sham", and an "attempted fraud". 3 FCC Rcd at 4090-91. The Parker-constructed applicant in that proceeding was disqualified by the presiding ALJ, 2 FCC Rcd at 6567. That decision was affirmed, "con brio", by a unanimous Review Board, 3 FCC Rcd at 4090-91. <sup>5/</sup>

5. Mr. Parker was also the principal of a permittee which the Commission found to have engaged in an effort to deceive the Commission. Mr. Parker was an officer, director and shareholder of Mt. Baker Broadcasting Co., Inc. ("MBBC"), a permittee of a new television station in Anacortes, Washington. MBBC had obtained extensions of its construction permit and finally, in December, 1986, the Mass Media Bureau denied MBBC's last extension application. MBBC sought reconsideration, claiming that it had constructed its station and was "commencing program tests with its facility" as of December 31, 1986. On the basis of those representations, on January 12, 1987, the staff

---

<sup>5/</sup> The Review Board was apparently so struck by Mr. Parker's conduct in Religious Broadcasting Network that the mere mention of Mr. Parker's name in an unrelated case caused the Board unanimously to add a footnote in its decision in that unrelated case in which it noted again that Parker had been involved in a "travesty and a hoax". The Board added that "[i]t is not clear from the record whether the Michael Parker in Religious Broadcasting Network is the same Mike Parker here, but we note that the modus operandi is similar." Doylan Forney, 3 FCC Rcd 6330, 6338, n. 1 (Rev. Bd. 1988). Mr. Parker has since acknowledged that he was the "Mike Parker" referred to in Doylan Forney. See Attachment A.

reinstated the permit on condition that a license application be filed within 10 days, by January 22, 1987.

6. When by the end of April, 1987, no license application had been filed, representatives of the Commission's Field Operations Bureau inspected the station. They found that the "facilities" which had been constructed did not even come close to the facilities which had been authorized.<sup>6/</sup> The staff determined that "good faith had not been shown". Mt. Baker Broadcasting Co., Inc., 3 FCC Rcd 4777 (1988). Since MBBC's original construction permit had expired without the filing of a license application, the staff cancelled the permit and ordered the station off the air. The Commission unanimously affirmed that action, holding that "the facts clearly indicate an intent to deceive the Commission". 3 FCC Rcd at 4778. MBBC argued that a forfeiture, rather than cancellation of the permit, was appropriate. The Commission flatly rejected that argument, finding that MBBC's conduct involved "substantial aggravating factors", including conduct which the Commission held to be "an effort to deceive the Commission" and "deception". 3 FCC Rcd at 4778.<sup>7/</sup>

---

<sup>6/</sup> The station which had been built included: a different antenna than that specified in the permit; a tower which was less than one-quarter the height authorized by the permit - 100 feet above ground level built, as opposed to 403 feet AGL authorized; an effective radiated power less than three-tenths of one percent (approximately 0.28%) of the authorized ERP - 10.3 kW installed, 3,630 kW authorized. 3 FCC Rcd at 4777.

<sup>7/</sup> The Commission noted that MBBC could have filed an application seeking modification of its permit, but failed to do  
(continued...)



Requested Issue No. 1 - Previously Adjudicated Misconduct

7. In 1993, Mr. Parker -- through Two If By Sea Broadcasting Corporation ("TIBS"), an entity of which Mr. Parker is an officer, the sole director and the sole shareholder -- proposed to acquire the license of Station WHCT-TV, Hartford, Connecticut. In December, 1996, with his assignment application still pending, Mr. Parker sought an immediate grant of that application. An adverse party in that proceeding opposed that request, pointing out inter alia Mr. Parker's involvement in the Religious Broadcasting Network and Mt. Baker matters.

8. The full Commission denied Mr. Parker's requested relief by letter dated January 30, 1997. Two If By Sea Broadcasting Corporation, 12 FCC Rcd 2254 (1997). Addressing Mr. Parker's history, the Commission concluded as follows:

Serious character questions also remain regarding the assignee, Parker/TIBS. For example, in one instance an administrative law judge disqualified an applicant in a comparative hearing for a new television station after finding Parker to be an undisclosed principal in that applicant. See Religious Broadcasting Network, 2 FCC Rcd 6561, 6566-67 (I.D. 1987). The Review Board upheld the disqualification, characterizing the application as a "travesty and a hoax", 3 FCC Rcd 4085, 5090 (Rev. Bd. 1988), and the applicant as a "transpicuous sham" which had "attempted fraud" upon the Commission. Id.

---

<sup>2/</sup>(...continued)

so. For its part, MBBC claimed that it had filed such an application, although substantially after the cancellation of its permit. However, the Commission disputed MBBC's claim, noting that the Commission was unable to find any record of the filing of any such application. See 3 FCC Rcd at 4778, n. 3. Since the Commission, in cancelling the permit, did not need to delve into further questions of misconduct, the Commission did not consider whether MBBC's claims concerning the supposed filing of a potentially curative application were themselves separate misrepresentations.

at 4091.

12 FCC Rcd at 2257. <sup>8/</sup>

9. The full Commission has thus mandated, in the very recent past, that applications in which Mr. Parker is the dominant principal may not be granted until his previously adjudicated misconduct has been considered. As the Commission specifically held, "serious character questions" remain regarding Mr. Parker. Those questions were not resolved in the Hartford proceeding, as the assignment application proposing sale of the station to TIBS has since been held in abeyance pending resolution of other unrelated matters.

10. The instant hearing provides the first opportunity to address those questions since the Commission's January, 1997 pronouncement concerning Mr. Parker. In view of Mr. Parker's controlling position in RBI, and in view of the Commission's unequivocal language quoted above, RBI's renewal application cannot be granted without a hearing into those matters. Accordingly, an appropriate issue should be added.

Requested Issue No. 2 - Misrepresentation/Lack of Candor

11. Mr. Parker's willingness to deceive the Commission did not stop with the acts described in the decisions in Mt. Baker and Religious Broadcasting Network. To the contrary, Mr. Parker sought to blunt the keenly adverse effect of those decisions by

---

<sup>8/</sup> TIBS sought reconsideration of that decision, but its petition was dismissed without substantive consideration. See Martin W. Hoffman, Trustee-in-Bankruptcy, 12 FCC Rcd 5224, 5233 (1997).

filing applications containing misleadingly innocent descriptions of those decisions. The apparent goal was to secure grants of those applications, which grants could then be cited as an indication that Mr. Parker's qualifications problems were really just insignificant events of the past.

12. Mr. Parker sought to implement this game plan in his effort to acquire Station WHCT-TV, Hartford. When the exceptionally harsh language -- and equally harsh disqualifying results -- of the Religious Broadcasting Network and Mt. Baker decisions were brought to the Commission's attention in late 1996-early 1997, Mr. Parker argued, inter alia, that no hearing was necessary because "the Commission has found Mr. Parker fully qualified with the same information before it". TIBS Petition for Reconsideration, filed March 3, 1997, at 13. In support of that claim, Mr. Parker cited Commission action granting assignment applications in which he (either individually or through corporations of which he was the sole shareholder) was the assignee. <sup>2/</sup>

13. But Mr. Parker's claim that the Commission had had before it "the same information" in those earlier applications was not true. In his applications for consent to acquire the

---

<sup>2/</sup> The stations involved in those assignment applications were: Station WTVE(TV), Reading (File No. BTCCT-911113KH); Station KVMD(TV), Twentynine Palms, California (File No. BTCCT-920603KG); and International Broadcast Station KAIJ (formerly KCBI), Dallas, Texas (File No. BALIB-9208100M). The assignee of Station KVMD(TV) was Desert 31 Television, Inc., a corporation of which Mr. Parker is an officer, the sole director and the sole shareholder. The assignee of Station KAIJ was TIBS.

Reading, Twentynine Palms and Dallas stations, Mr. Parker failed to provide that "same" damning information. Instead, he sought to create the misimpression that no serious questions had previously been raised about his qualifications. His failure to provide full and candid information concerning those applications raises further, separate questions concerning Mr. Parker's truth and candor before the Commission.

14. Mr. Parker formally acquired his interest in RBI in 1992. See File No. BTCCT-911113KH. <sup>10/</sup> He acquired his interests in the Twentynine Palms television permit and the Dallas short-wave station in late 1992. See File No. BTCCT-920603KG (granted November 24, 1992) and BALIB-920810OM (granted October 30, 1992).

15. In each of the applications in which Mr. Parker sought consent to acquire each of the RBI, Dallas short-wave and Twentynine Palms authorizations, Mr. Parker's portion of the application included an exhibit supposedly disclosing his previous history before the Commission. Each application contained the following statements in nearly identical language:

Mr. Parker also was an officer, director and shareholder of Mt. Baker Broadcasting Co. Mt. Baker Broadcasting Co.'s application for extension of time of its construction permit for KORC(TV), Anacortes, Washington (File No. BMPCT-860701KP) was denied. See Memorandum Opinion and Order, FCC 88-234, released August 5, 1988.

---

<sup>10/</sup> Commission records indicate that Mr. Parker had been active as an executive of RBI for several years prior to the Commission's formal approval of his transfer of control application.

Although neither an applicant nor the holder of an interest in the applicant to the proceeding, Mr. Parker's role as a paid independent consultant to San Bernardino Broadcasting Limited Partnership ("SBB"), an applicant for authority to construct a new commercial television station on Channel 30 in San Bernardino, California (MM Docket No. 83-911), was such that the general partner in SBB was held not to be the real-party-in-interest to that applicant and that, for purposes of the comparative analysis of SBB's integration and diversification credit, Mr. Parker was deemed such. See Religious Broadcasting Network et. al., FCC 88R-38, released July 5, 1988. This proceeding was settled in 1990 and Mr. Parker did not receive an interest of any kind in the Sandino Telecasters, Inc., the applicant awarded the construction permit. See Religious Broadcasting Network et. al., FCC 90R-101, released October 31, 1990.

Copies of the exhibits from the Commission's files are included as Attachments B, C and D. Virtually identical language also appeared in an application (File No. BTCCT-910725KG) in which Mr. Parker (through TIBS) formally sought to acquire control of the licensee of Station WHRC-TV, Norwell, Massachusetts. A copy of that exhibit is included as Attachment E. The Norwell application was also granted by the Commission.

16. From Mr. Parker's descriptions of the Mt. Baker and San Berdardino cases (quoted in Paragraph 15, above), those cases involved little out of the ordinary and did not raise any serious questions about his basic qualifications to be a Commission licensee. It is therefore not surprising that the staff, presented with Mr. Parker's less-than-complete description, might grant his applications.

17. But the Religious Broadcasting Network and Mt. Baker decisions did raise precisely such serious questions, as is clear

from the decisions themselves (quoted in Paragraphs 4 and 6, above) and as has been confirmed by a unanimous Commission in its January, 1997 letter in the Station WHCT-TV/Hartford case. The difference between the staff's reaction (in response to Mr. Parker's 1992 applications) and the Commission's (in 1997): in January, 1997, the Commission had been made aware of the actual nature of the earlier proceedings involving Mr. Parker.

18. In particular, Mr. Parker's deceptively innocent and simplistic description of the Mt. Baker case contained no reference whatsoever to the fact that the Commission had unanimously held that Mr. Parker's company had sought to deceive the Commission.

19. Mr. Parker's "disclosures" in Religious Broadcasting Network were even more affirmatively misleading. According to Mr. Parker, the adverse conclusion in Religious Broadcasting Network concerned "the comparative analysis of [the Parker applicant's] integration and diversification credit". He failed to mention that the presiding ALJ in that case had added a real-party-in-interest issue against that applicant on a qualifying, NOT a comparative, basis, and had resolved that issue adversely to the Parker applicant.

20. In the Dallas short-wave application (filed in August, 1992), Mr. Parker included the language quoted above (see Attachment C). It appears that the staff, in reviewing that statement, questioned whether any basic qualifying issues were pending against any of the applicants listed by Mr. Parker at the

time those applications were dismissed. In an amendment signed by Mr. Parker on October 22, 1992, he stated that:

As part of [the application for assignment of the Dallas short-wave license to TIBS], TIBS listed applications in which its officers, directors and principals had held interests and which were dismissed at the request of the applicant. This will confirm that no character issues had been added or requested against those applicants when those applications were dismissed. [emphasis added]

See Attachment F. That was patently untrue: a character issue had been both requested and added -- and resolved adversely to Mr. Parker's applicant -- in the Religious Broadcasting Network case, a case which had been listed in the Dallas short-wave assignment application as originally filed. Mr. Parker's October, 1992 amendment, therefore, plainly constituted misrepresentation. To the extent that that amendment failed to mention anything about the Commission's Mt. Baker decision -- in which the Commission had found Mr. Parker's company to have engaged in deception of the Commission -- the amendment was also lacking in candor.

21. The fact that the applications as submitted by Mr. Parker were granted is hardly surprising: those applications were not forthright and candid in their descriptions of Mr. Parker's history of misconduct before the Commission. Relying on the descriptions of the history of his earlier applications provided by Mr. Parker, the Commission's processing staff had no reason to believe that any serious questions had

been raised in earlier proceedings. <sup>11/</sup>

22. Adams anticipates that RBI will argue that Mr. Parker's inclusion, in his various filings, of references to the underlying decisions demonstrates an effort to be completely candid. That assertion raises at least two problems.

23. First, Mr. Parker's "disclosures" -- made years after the decisions in question -- never included the full official citation to the reported decisions in question; instead, he provided citations to document numbers only. Consistent with the Uniform System of Citation, the Commission's own rules require citation to the official FCC Record. 47 C.F.R. §1.14. That requirement is borne of certain practical considerations. For example, locating a particular decision (and especially a decision several years old) by document number is considerably more difficult than locating a reported opinion by its citation. As a practical matter, Mr. Parker's reference to the document number, and not the official reporter citation, thereby discouraged anyone -- including presumably Commission staff members -- from tracking down the decisions themselves.

24. Second, and more importantly, the provision of only a

---

<sup>11/</sup> Adams has also located in the Commission's files yet another application (File No. BPTTL-891208ZI) filed by Mr. Parker in his own name ("Micheal L. Parker") for a new low power television station in Los Angeles. That application, which was filed in December, 1989, is still pending. Exhibit II to this application supposedly provides the same information which was included in Mr. Parker's other applications concerning his other broadcast interests. A copy of that Exhibit II is included as Attachment G. Unlike Mr. Parker's other exhibits, this one does not even mention Religious Broadcasting Network!



document number citation suggests that no reported decision exists. See 47 C.F.R. §1.14. The lack of officially reported decisions would reinforce the notion that, whatever the decisions might have said, they probably did not involve any substantive matters of consequence. That suggestion would, of course, be consistent with Mr. Parker's carefully-crafted language downplaying the significance of the decisions in question: where the decisions (as mis-described by Mr. Parker) gave no hint of serious character qualifications questions (much less any adverse resolution of such questions), the Commission would presumably not have bothered to have those decisions published in the official reporter. Thus, it may reasonably be concluded that the failure to provide an official reporter citation was itself a further effort by Mr. Parker to throw the Commission off his track.

25. The history of Mr. Parker's applications confirms the success of his less-than-candid approach. Provided with only Mr. Parker's self-servingly redacted take on that history, the Commission's staff was willing to grant those applications. But once alerted to the full depth and breadth of the misconduct involved, the full Commission itself concluded that "[s]erious character questions also remain regarding" Mr. Parker. 12 FCC Rcd at 2257. Where such questions are pending with respect to an application, the Commission is statutorily prohibited from granting the application. 47 U.S.C. §309.

26. All applicants have an undeniable obligation to be

fully forthcoming as to all facts and information that may be decisionally significant to their applications. E.g., Swan Creek Communications v. FCC, 39 F.3d 1217, 1222 (D.C. Cir. 1994); Silver Star Communications-Albany, Inc., 102 FCC2d 1179, 1211, 59 RR2d 801 (1986); Fox River Broadcasting, Inc., 93 FCC2d 127, 53 RR2d 44 (1983). <sup>12/</sup> Mr. Parker has fallen well short of that standard in his submissions to the Commission concerning a number of different stations <sup>13/</sup> extending over a period of years. This is not a situation involving an isolated example of an inexperienced applicant who made a one-time-only mistake. Rather, we have here a pattern in which Mr. Parker or his corporate alter-egos have been caught, repeatedly, engaging in fraudulent or deceptive conduct before the Commission. Rather than disclose that fact in his subsequent efforts to acquire additional authorizations (including the transfer application by which he formally sought to gain control of RBI), Mr. Parker has elected, repeatedly, to provide partial, misleading information. Thus, the pattern of fraud and deception established in Religious Broadcasting Network and Mt. Baker has continued to this day.

27. Accordingly, an issue should be added to determine the

---

<sup>12/</sup> This obligation arises from the fact that the Commission must be able to rely completely on the representations made to it by its regulatees. E.g., Leflore Broadcasting Co., Inc. v. FCC, 636 F.2d 454 (D.C. Cir. 1980), citing inter alia FCC v. WOKO, Inc., 329 U.S. 223 (1946).

<sup>13/</sup> Significantly, the application pursuant to which Mr. Parker formally sought to acquire control of RBI was one of the applications in which his previous history of misconduct was not fully and candidly disclosed. See Attachment B.

effect of this misconduct on RBI's qualifications to remain a licensee.

Conclusion

28. Adams Communications Corporation submits that, in view of the foregoing, the following issues must be added herein:

To determine whether, in view of the previously adjudicated misconduct of Micheal L. Parker, the controlling shareholder and dominant principal of Reading Broadcasting, Inc. ("RBI"), RBI is qualified to remain a licensee.

To determine whether Micheal L. Parker engaged in a pattern of misrepresentation and/or lack of candor in failing to advise the Commission of the actual nature and scope of his previously adjudicated misconduct and, if so, the effect of such misrepresentation and/or lack of candor on RBI's qualifications to remain a licensee.

Respectfully submitted,

  
/s/ Harry F. Cole  
Harry F. Cole

Gene A. Bechtel  
Harry F. Cole

Bechtel & Cole, Chartered  
1901 L Street, N.W.  
Suite 250  
Washington, D.C. 20036  
(202) 833-4190

Counsel for Adams Communications  
Corporation

July 15, 1999

ATTACHMENT A

Copy of Exhibit 1 to Application (FCC Form 600)  
of Reading Broadcasting, Inc.  
for Mobile Radio Service Authorization  
(filed January 27, 1997)

Reading Broadcasting, Inc.  
Other Broadcast Interests  
Exhibit 1

Reading Broadcasting, Inc. ("RBI"), is licensee of commercial television station WTVE-TV, Reading, Pennsylvania, and certain auxiliary transmission services pursuant to Part 74 of the FCC's rules and business radio licenses which relate to operation of that station. RBI has no other broadcast or radio common carrier licenses.

None of the officers, directors or shareholders of RBI has any interest in any broadcast or radio common carrier licenses, except for Lawrence Rogow (a director of RBI) and Micheal L. Parker (an officer, director and record and beneficial owner of RBI stock).

**License Interests of Micheal L. Parker:** Mr. Parker and Partel, Inc., a corporation of which he is president, sole director and sole shareholder, have the following interests in broadcast licenses:

- (1) Partel, Inc., is a shareholder with approximately 29.7% interest in RBI. Additionally, Mr. Parker is a 13% shareholder in SWOB, Inc., a Pennsylvania corporation which in turn owns 11% of RBI.
- (2) Mr. Parker is a member and holder of 51% of the right to control and equity of Massachusetts Redevelopment Limited Liability Company, licensee of commercial television station WHRC(TV), Norwell, Massachusetts. An application for FCC consent to assignment of that license to an unrelated third party has been granted (File No. BALCT-961007IA).
- (3) Mr. Parker is president, sole director and sole shareholder of Two If By Sea Broadcasting Corporation, a Delaware corporation ("TIBS"). TIBS is licensee of International Broadcast Station KAIJ, Dallas, Texas, and is the proposed assignee of the licenses and assets of commercial television station WHCT-TV, Hartford, Connecticut, from Martin W. Hoffman, Esq., trustee in bankruptcy (File No. BALCT-930922KE). On April 9, 1993, TIBS was granted a construction permit for a new FM translator station to operate on Channel 221, Upland, California (File No. BPFT-920603KG).
- (4) Mr. Parker is president, sole director and sole shareholder of Desert 31 Television, Inc., licensee of commercial television station KVMD-TV. Twenty-nine Palms, California.

- (5) Mr. Parker has an application pending for a new low power television station to operate on Channel 68, Los Angeles, California (File No. BPTTL-891208ZI). The application was amended on April 1, 1993, to specify operation on Channel 26, Glendale, California.

**License Interests of Lawrence Rogow:** Lawrence Rogow is a member and owner of 50% of the voting rights and equity of Venture Technologies Group LLC. Venture is licensee of commercial television station WTWB-TV, Johnstown, Pennsylvania, and itself is a member and owner of 69% of the voting right and equity of World Television of Washington, LLC, licensee of commercial television station KBCB-TV, Bellingham, Washington.

Additionally, Mr. Rogow is a general partner with 95 percent of the right to control and equity interest in Jackson TV Company, licensee of commercial television station WHTV, Jackson, Michigan. He also is sole proprietor of Atrium Broadcasting Company, licensee of low power television stations W69CL, Hartford, Connecticut, KPHZ-LP, Phoenix, Arizona, and KNET-LP, Los Angeles, California. Additionally, he is a 16.7 percent shareholder of Viking Communications, Inc., licensee of low power television station W23AS, Providence, Rhode Island.

Mr. Rogow is a 50 percent general partner in the following partnerships:

- (1) World Television, a general partnership, licensee of low power television stations K38EA, Inland Empire, California; K69HJ, Phoenix, Arizona; and W30BH, Birmingham, Alabama.
- (2) Ponyland Broadcasting Company, a general partnership, licensee of low power television stations KTAZ-LP, Tucson, Arizona; and K31CK, Tucson, Arizona.
- (3) White Sage Broadcasting Company, a general partnership, licensee of low power television station K38DY, Calabasas, California.
- (4) Northridge Community Broadcasting Company, a general partnership, licensee of low power television station KSFV-LP, San Fernando, California.

**Other Broadcast Matters Related to Micheal Parker:** During the 1980's Micheal Parker was involved in the proceedings that are described below. Applications in which Mr. Parker was a principal were subsequently granted by the Commission. See File Nos. BTCCT-911113KH, BALIB-920810OM, and BTCCT-920603KG. Moreover, the matters involved are subject to the "ten year limitation" period

that applies to allegations under the *Policy Regarding Character Qualifications in Broadcast Licensing*, 102 FCC 2d 1179, 1229 (1986).

- (1) Mr. Parker, through his corporation, Partel, Inc., or its predecessor-in-interest, Mike Parker and Associates, a sole proprietorship, was engaged in the 1980's in providing television station consulting services. Among the clients of Mr. Parker was San Bernardino Broadcasting Limited Partnership, an applicant for construction permit for a new commercial television station to be licensed to San Bernardino, California. Although not an applicant, Mr. Parker was found to have been an undisclosed real-party-in-interest to the application of San Bernardino Broadcasting Limited Partnership. *Religious Broadcasting Network*, 2 FCC Rcd 6561 (ALJ 1987), modified 3 FCC Rcd 4085 (Rev. Bd. 1988).
- (2) Mike Parker & Associates also served as a consultant to Estrella Communications Limited Partnership, an applicant for a construction permit for a new commercial television station to be licensed to Tolleson, Arizona. That applicant was denied comparative credit for its proposal to integrate a general partner into day-to-day management of the station on the basis that Estrella's putative controlling principal of the applicant had ceded to Mr. Parker control over the budgeting process for the proposed station, and that she had abdicated to her communications attorneys too much control over the application and preserved for herself too little understanding of the representations she was making to the FCC. *Doyleen Forney*, 2 FCC Rcd 6935 (ALJ 1987), modified 3 FCC Rcd 6330 (Rev. Bd. 1988).
- (3) Mr. Parker was president, a director and a shareholder of Mt. Baker Broadcasting Company, Inc., permittee of commercial television station KORC(TV), Anacortes, Washington. The permittee lost its construction permit because the facilities which it constructed and with which it commenced operation pursuant to program test authority were substantially less than those authorized in the construction permit, despite permittee's representations to the contrary. After the FCC inspected the station, it ordered the licensee to cease operations, and denied reinstatement of the construction permit -- which had expired -- by a *Memorandum Opinion and Order*. *Mt. Baker Broadcasting Co.*, 3 FCC Rcd 4777 (1988).

ATTACHMENT B

Copy of Exhibit 3 to Transferee's Portion of  
File No. BTCCT-911113KH  
(Application for Consent to the Transfer  
of Control of the Licensee of Station WTVE (TV),  
Reading, Pennsylvania)



APPLICATION FOR CONSENT  
TO TRANSFER OF CONTROL  
FCC FORM 315  
SECTION I, PART I  
ITEM 7

EXHIBIT 3

Micheal L. Parker, President and Director of Reading Broadcasting, Inc., is the 100% voting stockholder of Two If By The Sea Broadcasting Corporation. Two If By the Sea Broadcasting Corporation owns 51% of the stock of Massachusetts Channel 46 Corporation, licensee of WHRC(TV), Norwell, Massachusetts.

Mr. Parker has an application pending for a new low power television on Channel 68 at Los Angeles, California (FCC File No. BPTTL-891208ZI).

Mr. Parker held jointly with his wife, Judith Parker, a stock interest in Pacific Rim Broadcasting Co. ("Pacific Rim"), which filed an application to modify its construction permit for KPRR-TV, Channel 14, Honolulu, Hawaii, to operate on Channel 5 (FCC File No. BMPCT-830223KO, MM Docket No. 83-734). The application was dismissed by the Commission with prejudice pursuant to Pacific Rim's request. See Memorandum Opinion and Order, FCC 84M-1202, released March 12, 1984.

Mr. Parker's application for a new commercial television station on Channel 29 at Sacramento, California (FCC File No. BPCT-820824KJ, MM Docket No. 83-66) was dismissed with

prejudice pursuant to his request. See Memorandum Opinion and Order, FCC 83M-1594, released May 17, 1983.

Mr. Parker also was an officer, director and shareholder of Mt. Baker Broadcasting Co. Mt. Baker Broadcasting Co.'s application for extension of time of its construction permit for KORC(TV), Anacortes, Washington (FCC File No. BMPCT-860701KP) was denied. See Memorandum Opinion and Order, FCC 88-234, released August 5, 1988.

Although neither an applicant nor the holder of an interest in the applicant to the proceeding, Mr. Parker's role as a paid independent consultant to San Bernadino Broadcasting Limited Partnership ("SBB"), an applicant for authority to construct a new commercial television station on Channel 30 in San Bernadino, California (MM Docket No. 83-911), was such that the general partner in SBB was held not to be the real-party-in interest to that applicant and that, for purposes of the comparative analysis of SBB's integration and diversification credit, Mr. Parker was deemed such. See Religious Broadcasting Network et. al., FCC 88R-38, released July 5, 1988. This proceeding was settled in 1990 and Mr. Parker did not receive an interest of any kind in the Sandino Telecasters, Inc., the applicant awarded the construction permit. See Religious Broadcasting Network et. al., FCC 90R-101, released October 31, 1990.

ATTACHMENT C

Copy of Exhibit 3 to Assignee's Portion of  
File No. BALIB-920810OM  
(Application for Consent to the Assignment of License  
of International Broadcast Station KCBI, Dallas, Texas

APPLICATION FOR CONSENT  
TO ASSIGNMENT  
FCC FORM 314  
SECTION II, ITEM 7

EXHIBIT 3

Micheal L. Parker is President and Director of Reading Broadcasting, Inc., WTVE, Channel 51 at Reading, Pennsylvania. Micheal L. Parker is President of Partel, Inc. which holds a 29.69 percent equity interest in Reading Broadcasting, Inc.

Micheal L. Parker is President of Two If By Sea Broadcasting Corporation which holds a fifty-one percent (51%) ownership interest in Massachusetts Channel 46 Corporation, WHRC TV, Norwell, Massachusetts. Transfer of Control granted September 11, 1991. FCC File No. BTCCT-910725KG. Until recently, Massachusetts Corporation was the Licensee of WHRC(TV), Norwell, Massachusetts. On March 23, 1992, the Commission granted the involuntary assignment of the station's license to George E. Clancy. Mr. Clancy was appointed receiver of the corporation by the Plymouth County Superior Court, Commonwealth of Massachusetts.

Micheal L. Parker has an application pending before the Federal Communications Commission for Transfer of Control of Channel 31, KVMD(TV), Twentynine Palms, California. Filed June 3, 1992.

Two If By Sea Broadcasting Corporation has an application pending before the Federal Communications, FCC Form 349, Application for Authority to Construct or Make Changes in an FM Transaltor or FM Booster Station; Channel 201, 88.1mhz, Upland, California. Filed July 7, 1992. FCC File No. 920707TB.

An application requesting Consent to Assignment of the license of KZIA(TV), Las Cruces, New Mexico, from Southwestern Broadcasting Co., Inc. to Two If By Sea Broadcasting Corporation pending at the Commission (FCC File No. BALCT-920406KJ) was dismissed without prejudice effective July 2, 1992 pursuant to a request by Southwestern Broadcasting Co., Inc.

Micheal L. Parker has an application pending before the Federal Communications Commission for a new low power television on Channel 68 at Los Angeles, California. Filed December 8, 1989. FCC File No. BPTTL-891208ZI.

Micheal L. Parker was an Executive Vice President and Director of West Coast United Broadcasting Co., Channel 38 at San Francisco, California which has an application pending before the Federal Communications Commission for a new low power television on Channel 66 at San Francisco, California. Filed December 8, 1989. FCC File No. BLCT-890926KE.

Micheal L. Parker held jointly with his wife, Judith Parker, a stock interest in Pacific Rim Broadcasting Co., which was an applicant for a construction permit to modify its construction permit for KPRR-TV, Channel 14, Honolulu, Hawaii, to operate on Channel 5, FCC File No. BMPCT-830223KO, MM Docket No. 83-734.

The application was dismissed by the Commission with prejudice effective March 12, 1984 pursuant to request by Pacific Rim Broadcasting Co. See Memorandum Opinion and Order, FCC 84M-1202, released March 12, 1984.

An application of Micheal Parker for a new commercial television station on Channel 29 at Sacramento, California, FCC File No. BPCT-820824KJ, MM Docket No. 83-66, was dismissed with prejudice effective May 17, 1983 pursuant to request by Mr. Parker. See Memorandum Opinion and Order, FCC 83M-1594, released May 17, 1983.

In addition, Micheal Parker was an officer, director and shareholder of Mt. Baker Broadcasting Co., which was denied an application for extension of time of its construction permit for KORC(TV), Anacortes, Washington, FCC File No. BMPCT-860701KP. See Memorandum Opinion and Order, FCC 88-234, released August 5, 1988.

Although neither an applicant nor the holder of an interest in the applicant to the proceeding, Micheal Parker's role as a paid independent consultant to San Bernardino Broadcasting Limited Partnership ("SBB"), an applicant in MM Docket No. 83-911 for authority to construct a new commercial television station on Channel 30 in San Bernardino was such that the general partner of SBB was held not to be the real party in interest to that applicant and that, instead, for the purposes of the comparative analysis of SBB's integration and diversification credit, Mr. Parker was deemed such. See e.g. Religious Broadcasting Network et. al., FCC 88R-38

released July 5, 1988. MM Docket No. 83-911 was settled in 1990 and Mr. Parker did not receive an interest of any kind in the applicant awarded the construction permit therein, Sandino Telecasters, Inc. See Religious Broadcasting Network et. al. FCC 90R-101 released October 31, 1990.

ATTACHMENT D

Copy of Exhibit 4 to Transferee's Portion of  
File No. BTCCT-920603KG  
(Application for Consent to the Transfer of Control of the  
Permittee of Station KVMD(TV), Twentynine Palms, California)



APPLICATION FOR CONSENT  
TO TRANSFER OF CONTROL  
FCC FORM 315  
SECTION I, PART I  
ITEM 7

EXHIBIT 4

Micheal L. Parker is President and a Director of Reading Broadcasting, Inc., licensee of WTVE(TV), Reading, Pennsylvania. Micheal L. Parker also is President and 100% stockholder of Partel, Inc., which holds a 29.69% equity interest in Reading Broadcasting, Inc.

Mr. Parker also is the 100% voting stockholder of Two If By The Sea Broadcasting Corporation. Two If By the Sea Broadcasting Corporation owns 51% of the stock of Massachusetts Channel 46 Corporation. Until recently, Massachusetts Channel 46 Corporation was the licensee of WHRC(TV), Norwell, Massachusetts. On March 23, 1992, the Commission granted the involuntary assignment of the station's license to George E. Clancy. Mr. Clancy was appointed receiver of the corporation by the Plymouth County Superior Court, Commonwealth of Massachusetts.

An application requesting consent to the assignment of the license of KZIA(TV), Las Cruces, New Mexico, from Southwestern Broadcasting Co., Inc. to Two If By the Sea Broadcasting Corporation is pending at the Commission (FCC File No. BALCT-920406KJ). Micheal Parker owns 100% of the assignee's stock.

Mr. Parker was an Executive Vice President and a Director of West Coast United Broadcasting Co., licensee of KCNS(TV), San Francisco, California. West Coast has pending an application for a new low power television station on Channel 66 at San Francisco, California (FCC File No. BLCT-890926KE).

Mr. Parker has an application pending for a new low power television on Channel 68 at Los Angeles, California (FCC File No. BPTTL-891208ZI).

Mr. Parker held jointly with his wife, Judith Parker, a stock interest in Pacific Rim Broadcasting Co. ("Pacific Rim"), which filed an application to modify its construction permit for KPRR-TV, Channel 14, Honolulu, Hawaii, to operate on Channel 5 (FCC File No. BMPCT-830223KO, MM Docket No. 83-734). The application was dismissed by the Commission with prejudice pursuant to Pacific Rim's request. See Memorandum Opinion and Order, FCC 84M-1202, released March 12, 1984.

Mr. Parker's application for a new commercial television station on Channel 29 at Sacramento, California (FCC File No. BPCT-820824KJ, MM Docket No. 83-66) was dismissed with prejudice pursuant to his request. See Memorandum Opinion and Order, FCC 83M-1594, released May 17, 1983.

Mr. Parker also was an officer, director and shareholder of Mt. Baker Broadcasting Co. Mt. Baker Broadcasting

Co.'s application for extension of time of its construction permit for KORC(TV), Anacortes, Washington (FCC File No. BMPCT-860701KP) was denied. See Memorandum Opinion and Order, FCC 88-234, released August 5, 1988.

Although neither an applicant nor the holder of an interest in the applicant to the proceeding, Mr. Parker's role as a paid independent consultant to San Bernadino Broadcasting Limited Partnership ("SBB"), an applicant for authority to construct a new commercial television station on Channel 30 in San Bernadino, California (MM Docket No. 83-911), was such that the general partner in SBB was held not to be the real-party-in interest to that applicant and that, for purposes of the comparative analysis of SBB's integration and diversification credit, Mr. Parker was deemed such. See Religious Broadcasting Network et. al., FCC 88R-38, released July 5, 1988. This proceeding was settled in 1990 and Mr. Parker did not receive an interest of any kind in the Sandino Telecasters, Inc., the applicant awarded the construction permit. See Religious Broadcasting Network et. al., FCC 90R-101, released October 31, 1990.

ATTACHMENT E

Copy of Exhibit I to Transferee's Portion of  
File No. BTCCT-920725KG  
(Application for Consent to the Transfer of Control of the  
Licensee of Station WHRC(TV), Norwell, Massachusetts)

Micheal L. Parker  
FCC Form 315

EXHIBIT I

Micheal L. Parker  
22720 S.E. 410th Street  
Enumclaw, WA 98022  
(206) 825-1099

Micheal L. Parker is President and Director of Reading Broadcasting, Inc., WTVE, Channel 51 at Reading, Pennsylvania. He holds no equity interest in Reading Broadcasting, Inc.

Micheal L. Parker has an application pending before the Federal Communications Commission for a new low power television on Channel 68 at Los Angeles, California. Filed December 8, 1989. FCC File No. BPTTL-891208ZI.

Micheal L. Parker is an Executive Vice President and Director of West Coast United Broadcasting Co., Channel 38 at San Francisco, California which has an application pending before the Federal Communications Commission for a new low power television on Channel 66 at San Francisco, California. Filed December 8, 1989. FCC File No. BLCT-890926KE.

Micheal L. Parker held jointly with his wife, Judith Parker, a stock interest in Pacific Rim Broadcasting Co., which was an applicant for a construction permit to modify its construction permit for KPRR-TV, Channel 14, Honolulu, Hawaii, to operate on Channel 5, FCC File No. BMPCT-830223KO, MM Docket No. 83-734. The application was dismissed by the Commission with

prejudice effective March 12, 1984 pursuant to request by Pacific Rim Broadcasting Co. See Memorandum Opinion and Order, FCC 84M-1202, released March 12, 1984. An application of Micheal Parker for a new commercial television station on Channel 29 at Sacramento, California, FCC File No. BPCT-820824KJ, MM Docket No. 83-66, was dismissed with prejudice effective May 17, 1983 pursuant to request by Mr. Parker. See Memorandum Opinion and Order, FCC 83M-1594, released May 17, 1983. In addition, Micheal Parker was an officer, director and shareholder of Mt. Baker Broadcasting Co., which was denied an application for extension of time of its construction permit for KORC(TV), Anacortes, Washington, FCC File No. BMPCT-860701KP. See Memorandum Opinion and Order, FCC 88-234, released August 5, 1988.

Although neither an applicant nor the holder of an interest in the applicant to the proceeding, Micheal Parker's role as a paid independent consultant to San Bernardino Broadcasting Limited Partnership ("SBB"), an applicant in MM Docket No. 83-911 for authority to construct a new commercial television station on Channel 30 in San Bernardino, CA, was such that the general partner in SBB was held not to be the real party in interest to that applicant and that, instead, for purposes of the comparative analysis of SBB's integration and diversification credit, Mr. Parker was deemed such. See e.g. Religious Broadcasting Network et. al., FCC 88R-38 released July 5, 1988. MM Docket No. 83-911 was settled in 1990 and Mr. Parker did not receive an interest of any kind in the

applicant awarded the construction permit therein, Sandino  
Telecasters, Inc. See Religious Broadcasting Network et. al.,  
FCC 90R-101 released October 31, 1990.

ATTACHMENT F

Amendment (dated October 28, 1992) to Assignee's Portion of  
File No. BALIB-920810OM  
(Application for Consent to the Assignment of License  
of International Broadcast Station KCBI, Dallas, Texas



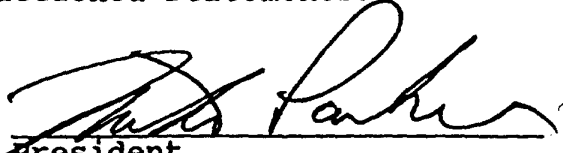
OCT 29 1992

OCT 30 10 47 AM '92 FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: KCBI AUDIO SERVICES  
DIVISION

Please amend the application by Two If By Sea Broadcasting Corporation to acquire Station KCBI from Criswell Center for Biblical Studies by including the attached statements.

Date: 10/28/92

  
\_\_\_\_\_  
President  
Two If By Sea Broadcasting  
Corporation

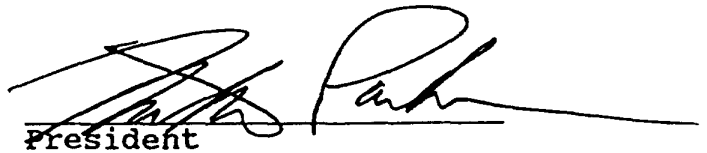
Re: Two If By Sea Broadcasting Corporation

Two If By Sea Broadcasting Corporation ("Two If By Sea") has applied for authority to acquire Station KCBI from Criswell Center for Biblical Studies. As part of that application, Two If By Sea listed applications in which its officers, directors and principals had held interests and which were dismissed at the request of the applicant. This will confirm that no character issues had been added or requested against those applicants when those applications were dismissed.

Dated:

Oct. 27, 1992

By:



President

Two if By Sea Broadcasting  
Corporation

ATTACHMENT G

Exhibit II to FCC Form 346  
File No. BPTTL-891208ZI  
(Application for Construction Permit  
for New Low Power Television Station  
in Los Angeles, California)

Micheal L. Parker  
FCC Form 346

EXHIBIT II

Micheal L. Parker held jointly with his wife, Judith Parker, a stock interest in Pacific Rim Broadcasting Co., which was an applicant for a construction permit to modify its construction permit for KPRR-TV, Channel 14, Honolulu, Hawaii, to operate on Channel 5, FCC File No. BMPCT-830223KO, MM Docket No. 83-734. The application was dismissed by the Commission with prejudice effective March 12, 1984 pursuant to request by Pacific Rim Broadcasting Co. See Memorandum Opinion and Order, FCC 84M-1202, released March 12, 1984. An application of Micheal Parker for a new commercial television station on Channel 29 at Sacramento, California, FCC File No. BPCT-820824KJ, MM Docket No. 83-66, was dismissed with prejudice effective May 17, 1983 pursuant to request by Mr. Parker. See Memorandum Opinion and Order, FCC 83M-1594, released May 17, 1983. In addition, Micheal Parker is an officer, director, and shareholder of Mt. Baker Broadcasting Co., which was denied an application for extension of time of its construction permit for KORC(TV), Anacortes, Washington, f FCC File No. BMPCT-860701KP. See Memorandum Opinion and Order, FCC 88-234, released August 5, 1988. Mt. Baker Broadcasting Co. has pending before the Commission a Petition for Reconsideration of that decision.

CERTIFICATE OF SERVICE

I hereby certify that, on this 15th day of July, 1999, I caused copies of the foregoing "Motion to Enlarge Issues" to be placed in the U.S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following:

The Honorable Richard L. Sippel  
Chief Administrative Law Judge  
Federal Communications Commission  
445 12th St., S.W. - Room 1-C864  
Washington, DC 20554  
(BY HAND)

Norman Goldstein, Esquire  
James Shook, Esquire  
Enforcement Division  
Mass Media Bureau  
Federal Communications Commission  
445 12th Street, N.W. - Room 3-A463  
Washington, D.C. 20554  
(BY HAND)

Jack A. Linton, Esq.  
Linton & Giannnascoli, P.C.  
1720 Mineral Spring Road  
Reading, Pennsylvania 19603  
Counsel for Reading Broadcasting, Inc.

Frank D. McCracken  
Executive Vice President  
Reading Broadcasting, Inc.  
1729 North 11th Street  
Reading, Pennsylvania 19604

Courtesy copy to:

Thomas J. Hutton, Esquire  
Holland & Knight, L.L.P.  
2100 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20037-3202

  
/s/ Harry F. Cole  
Harry F. Cole